

Exhibit A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

KASTURI HALDAR,

Plaintiff,

v.

UNIVERSITY OF NOTRE DAME DU LAC,
SANTIAGO SCHNELL, AND CINDY
PARSEGHIAN,

Defendants.

Case No. 3:24-cv-00836-
CCB-SJF

AFFIDAVIT OF ALEJANDRO LOPEZ-RAMIREZ

I, Alejandro Lopez-Ramirez, do hereby depose and state as follows:

1. I am a Ph.D. candidate at the University of Notre Dame, and a first-generation graduate student.
2. I have worked in the Haldar laboratory since June 2021.
3. My research focuses on non-ketotic hyperglycinemia (NKH). Specifically, I conduct gene therapy experiments and study brain energy metabolism on mice that we have bred to have unique attributes related to NKH. In addition, I have had a small project in Kabuki Syndrome that involves behavioral studies and molecular analyses in the Kabuki Syndrome mouse..
4. I have been very successful in my work in the Haldar lab, and my hope was to be able to finish my Ph.D. in this lab.
5. Because of my research, I was selected as a Society for Neuroscience Fellow for 2024-2026.

6. My presentation at the October 2024 Society for Advancement of Chicanos/Hispanics & Native Americans in Science conference was selected as the best presentation in Psychology & Social Sciences and Neurosciences.
7. I met with Rebecca Wingert, Director of Graduate Studies, on November 19, 2024, to discuss how I could finish my Ph.D. if Dr. Haldar is no longer allowed to be my advisor.
8. Dr. Wingert told me in that meeting to submit a list to her of all of the material resources I would need to finish my Ph.D. I told her I would do my best, but that it was hard to predict everything I might need in the future, or what experiments my thesis committee or publication reviewers might ask me to do. She expressed that she understood some measure of flexibility was needed in assessing my material needs.
9. We did not discuss in that meeting what kind of academic and scientific support and expertise I would need access to to complete my work.
10. Dr. Wingert implied in our meeting that working with her as my advisor was the only option Notre Dame was offering me to allow me to finish my Ph.D. When I asked Dr. Wingert if she had space for me in her lab, she said she did not, but she could try to find half of a lab bench for me. I told her I needed a full lab bench for my work.
11. Dr. Wingert works on kidney research in fish. She has no experience working on mammalian brain disease or gene therapy. She used to study the effect of NKH mutations on kidneys using fish, but has not done that work for over a year.
12. A significant concern I have about joining the Wingert lab is Dr. Wingert's lack of background or familiarity with either the literature in my field or the experimental techniques I use. Just last week I took some data to her and asked her to review it and she told me she couldn't review them because my work is not within her "wheelhouse."

13. I am concerned that without access to an advisor who understands my work, I will not be able to complete my Ph.D.
14. In the week after my meeting with Professor Wingert, I attempted to put together an excel spreadsheet listing the material needs for my planned experiments. I have never put together a budget before and because I do not currently have an advisor, I had no one to ask for help. I did my best to list out everything I thought I would need to finish my Ph.D. research, though I wasn't able to calculate the monetary value of those research needs.
15. On November 26, 2024, Dr. Wingert emailed me and told me it was urgent that I submit my list to her by the following day. I submitted an excel spreadsheet to her on November 27, 2024.
16. I have not heard anything about my research needs from Dr. Wingert or anyone else at Notre Dame since submitting the list on November 27. No representative of Notre Dame has told me whether Notre Dame will pay for the items I listed.
17. I never heard back from Dr. Wingert about whether she had a full lab bench I could use in her lab.
18. On December 2, 2024, Dr. Wingert told me that she and I were going to meet with the employees at the mouse breeding facility on December 6, 2024 to discuss what steps need to be taken to continue breeding mice. This was the first and only communication I have received indicating that the mouse colonies are not going to be euthanized. I was not given any more details about Notre Dame's plans for the mice or my use of them.
19. On December 3, 2024, I met with Dr. Ana Flores Mirelis, who works in mouse models and has the background to understand my research. Dr. Mirelis expressed willingness to

serve as my new thesis advisor. I do not know whether Notre Dame will allow Dr. Mirelis to serve as my advisor, but she would be my choice.

20. On December 4, 2024, I met with the BIOS department chair, Jason Rohr. He told me we needed to start moving things out of Dr. Haldar's lab soon so that they can close the lab and change the locks on December 12. Dr. Rohr suggested that I might be able to use lab space near Dr. Wingert's lab that is becoming available in January 2025. I am unclear if I will have a place to to work and store my materials for the next month or however long it takes to find lab space for me, or whether there is lab space that will definitely be available to me.
21. On December 4, 2024, Nancy Horvath, the BIOS department manager, and Nick Hathaway, the facilities program manager, told me to start preparing to move things to a different floor of our building. When I asked if they knew where the lab's materials are moving to they said they did not. Nancy and Nick said we would move my frozen belongings into a set of freezers in the basement of the building.
22. I need my protein samples to be in a freezer near my lab bench. Traveling between floors to retrieve samples will expose the samples to ambient temperature for longer than is appropriate and may impact my experiments.
23. If I have to move out of Dr. Haldar's lab space, it will likely take at least a couple of weeks for me to set everything up again and be able to resume experiments once I am assigned to a new location. If I am required to move first to a temporary location and then to a more permanent location I will lose multiple weeks of work each time I have to move.

24. I know Notre Dame has prohibited Dr. Haldar from continuing to supervise me, but I have not been given any clarity on what role she can continue to play on my thesis committee or as a scientific advisor. There are only three people in the world who study NKH at the mouse level; whether or not Dr. Haldar is my Ph.D. advisor, I cannot finish my work without her input and feedback. While I assume I can continue to interact with her as a fellow scientist, Notre Dame has not made clear what role she will play in my Ph.D. going forward.

25. As things stand, I have talked to two professors about joining their labs but have not officially obtained a new advisor and do not know if Notre Dame will approve the advisor more suited to my work. I have not heard directly from anyone at Notre Dame as to whether the University will pay for the resources I need for my experiments. I do not know where I will be working or where my materials will be stored when they are moved out of the Haldar lab, or how long I will have to wait to be given new space to work in. I have no clarity on whether there are any restrictions on my ability to collaborate with Dr. Haldar and get her advice and feedback on my work.

Signed under the pains and penalties of perjury this 6 day of December, 2024.

Alejandro Lopez-Ramirez

Alejandro Lopez-Ramirez